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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

HOFFMAN CONSTRUCTION COMPANY
OF OREGON, a domestic corporation,

Case No: 6:05-CV-456-AA

Plaintiff,

vs.

**DEFENDANT TRAVELERS' MOTION
FOR SUMMARY JUDGMENT**

TRAVELERS INDEMNITY INSURANCE
COMPANY, a foreign corporation;
ADVANCED TECHNOLOGY GROUP, a
domestic corporation,

Pursuant to FRCP 56
REQUEST FOR ORAL ARGUMENT

Defendants.

Defendant Travelers Indemnity Insurance Company certifies that it has conferred by telephone with John Ostrander, and the parties made a good faith effort to resolve this matter but were unable to do so.

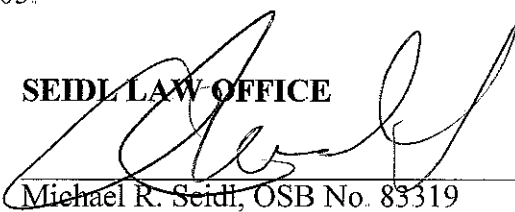
Pursuant to FRCP 56, Defendant Travelers Indemnity Insurance Company ("Travelers") hereby moves the court for an order granting it summary judgment on the basis that there is no genuine issue of any material fact and Travelers is entitled as a matter of law to a judgment in its favor.

In support of this motion, Travelers will rely upon the attached Concise Statement of Material Undisputed Facts, Memorandum of Points and Authorities and Affidavit of Michael R. Seidl.

DATED this 29th day of August, 2005.

SEIDL LAW OFFICE

By:


Michael R. Seidl, OSB No. 83319

Attorney for Travelers

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 29th day of August, 2005, I caused to be served true copies of the foregoing MOTION FOR SUMMARY JUDGMENT by the method indicated below, and addressed to each of the following:

John D. Ostrander Attorney at Law Elliott, Ostrander & Preston, P.C. 707 SW Washington Street, Suite 1500 Portland OR 97205	<input checked="" type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> Telecopy
Scott Zerlaut Attorney at Law Shorall McGoldrick Brinkmann 3030 North Central Ave., Ste. 1000 Phoenix AZ 85012	<input checked="" type="checkbox"/> U.S. Mail, Postage Prepaid <input type="checkbox"/> Hand Delivered <input type="checkbox"/> Overnight Mail <input checked="" type="checkbox"/> Telecopy


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